



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ALC/DCP/LHE/PTH  
F. #2016R00505

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 28, 2019

**By ECF and Email**

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Re: United States v. Mark Nordlicht, et al.  
Criminal Docket No. 16-640 (BMC)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. All of the enclosed materials qualify as "Discovery Materials" under the January 23, 2017 Stipulation and Order entered in the above-captioned case, ECF Docket No. 76, and their use and dissemination are restricted as provided in that Stipulation and Order. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017, April 26, 2017, May 5, 2017, May 11, 2017, May 26, 2017, June 16, 2017, June 20, 2017, July 3, 2017, July 6, 2017, July 17, 2017, July 27, 2017, August 21, 2017, August 22, 2017, August 30, 2017, September 15, 2017, October 4, 2017, November 7, 2017, December 26, 2017, March 6, 2018 April 2, 2018, May 10, 2018, June 28, 2018, October 5, 2018, October 26, 2018, January 4, 2019, January 25, 2019, February 4, 2019, February 15, 2019, April 4, 2019, April 25, 2019, May 6, 2019 and May 16, 2019. The government again requests reciprocal discovery from the defendants.

Defense Counsel

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The discovery production made available to you on May 28, 2019 contains two emails sent by Platinum Partners employees to personnel of Andina Family Office. These emails have been Bates numbered EDNY-MISC-000104 – EDNY-MISC-000564.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney  
Eastern District of New York

By:                     /s/                      
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cc: Clerk of the Court (BMC) (by ECF) (w/o enclosures)  
Defense Counsel (by ECF and E-mail) (w/o enclosures)